

January 12, 2012

International Compliance Assurance Division  
Office of Federal Activities  
US Environmental protection Agency  
Ariel Rios Building, Mail Code 2254A  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460  
Attn: Mr. Scott Nelson


Dear Mr. Nelson;

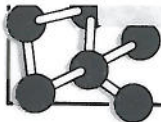
In accordance with EPA regulations 40 CFR 262.56 and 262.87(a), PCI Synthesis is submitting the CY 2011 annual report for the export of hazardous waste.

An electronic copy of the CY 2011 report and this cover letter has been sent to Ms. Laura Coughlan at [coughlan.laura@epa.gov](mailto:coughlan.laura@epa.gov). The report is in the MS EXCEL format using the spreadsheet provided by your office.

If there are any questions or concerns regarding this report or any other matter, please contact me by email; [bill.anderson@pcisynthesis.com](mailto:bill.anderson@pcisynthesis.com) or by phone, (978) 463-4882.

Best Regards;

  
Bill Anderson  
Manager, Environmental Health & Safety  
PCI Synthesis  
9 Opportunity Way  
Newburyport, MA 01950  
(978) 463-4882



**PCI  
Synthesis**

9 Opportunity Way  
Newburyport, MA 01950

**CERTIFIED MAIL**



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Department: 2254A

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1200 Pennsylvania Ave, NW  
Washington, D.C. 20460

CY 2011 Hazardous Waste Export Report

**FIRST CLASS MAIL**

**FIRST CLASS MAIL**


**Exporter Information**

<b>Exporter Name:</b>	PCI Synthesis
<b>Exporter EPA Identification Number:</b>	MAR000007955
<b>Exporter Mailing Street Address:</b>	9 Opportunity Way
<b>Exporter Mailing City:</b>	Newburyport
<b>Exporter Mailing State:</b>	Massachusetts
<b>Exporter Mailing Zip Code:</b>	1950
<b>Exporter Mailing Country:</b>	US
<b>Exporter Site Street Address:</b>	9 Opportunity Way
<b>Exporter Site City:</b>	Newburyport
<b>Exporter Site State:</b>	Massachusetts
<b>Exporter Site Zip Code:</b>	1950
<b>Exporter Site Country:</b>	US

<b>Calendar Year Covered by Report:</b>	<b>2011</b>
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**Exporter Certification**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

<b>Exporter Printed Name:</b>	Bill Anderson
<b>Exporter Signature:</b>	
<b>Date of Signature:</b>	1/12/2012

As required in 40 CFR 262.56(a)(5) and 40 CFR 262.87(a)(5), Except for hazardous waste produced by exporters of greater than 100 kg but less than 1000 kg in a calendar month, unless provided pursuant to §262.41 [biennial report], when submitting in even numbered years:

(i) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated:

**PCI incorporates solvent reuse and recycle in every manufacturing process that will allow. Each process is reviewed during scale up and HAZOP (step by step) to identify any way hazardous materials ( mostly solvents) can be reused or recycled (Onsite or by offsite vendor). The toxicity of the materials used can be reduced slightly through substitution, however, the formulation of our main product (Active Pharmaceutical Ingredients, API'S) cannot be deviated from due to CGMp and FDA regulations.**

(ii) A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984:

**PCI exported five organic solvent streams and one halogenated organic solvent stream as hazardous waste. Alll the material is recycled for reuse.**



[illegible]

